

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13  
:   
MICHAEL SCHNITZEL :   
Debtor : Bankruptcy No. 18-15143AMC

**CHAPTER 13 STANDING TRUSTEE'S ANSWER TO  
MOTION TO MODIFY PLAN POST CONFIRMATION**

Jack K. Miller, counsel for the trustee, William C. Miller, answers the Motion to Modify as follows:

1. Debtor has made no trustee payments since January 10, 2019.
2. The proposed plan does not address the claim filed by the City of Philadelphia.
3. The proposed plan does not address the amended claim filed by the mortgagee in the amount of \$14,199.

WHEREFORE, the trustee respectfully requests that the Motion to Modify Plan be denied.

Respectfully submitted,

/s/ Jack K. Miller

Date: July 8, 2019

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Jack K. Miller, Esquire, Staff Attorney for  
William C. Miller, Esquire  
Chapter 13 Standing Trustee